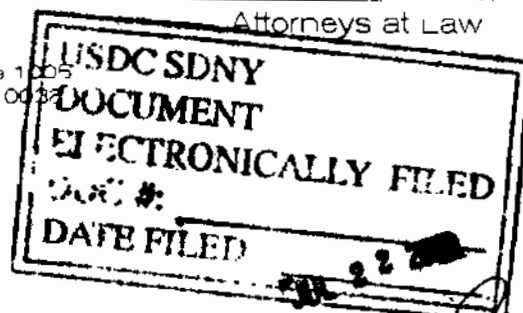


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July 17, 2008

SO ORDERED

Honorable George B. Daniels, U.S.D.J.
 United States District Court
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

George B. Daniels
HON. GEORGE B. DANIELS

JUL 22 2008

Re: Jones v. The Prudential Insurance Company of America
 Docket No.: 08-CV-489 (GBD)

Dear Judge Daniels:

The above referenced matter has recently been transferred to our firm for handling. We will be representing The Prudential Insurance Company of America ("Prudential") and have filed a Change of Counsel form and an Appearance in this matter. Additionally, the outgoing firm, Morgan, Lewis & Bockius, LLP, has filed a Request to Withdraw as Counsel.

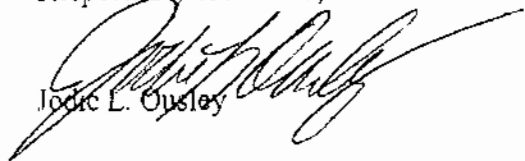
We received the file in this matter only two days ago, but immediately noted that the Civil Case Management Plan indicates that discovery in this matter is to be completed by August 6, 2008. Unfortunately, a cursory review of the file shows that discovery is not complete. Paper discovery has not been exchanged and depositions have not been conducted. I am currently reviewing the file and the discovery demands that have been served upon my client and have indicated to Plaintiff's counsel that I hope to provide responses from Defendant by the end of next week. Some of the documents requested, if in my client's possession, will require a Stipulation of Confidentiality. The undersigned is preparing same and counsel for Plaintiff has agreed to execute said document.

Although we are working to move discovery forward as quickly as possible from this point, this firm needs an opportunity to review the file and the discovery demands so that proper discovery responses can be served and relevant and discoverable documents can be exchanged by all parties. I have spoken with counsel for Plaintiff and he has consented to this request for an extension of the discovery end date. Please note that no previous request has been made for an extension of time regarding discovery in this matter.

Therefore, we respectfully request that the Court grant an additional three months for the completion of discovery and adjourn the end discovery date to November 6, 2008. Both parties are in agreement that the remaining discovery can be completed within this time frame.

Should Your Honor have any questions or concerns, please do not hesitate to contact the undersigned at the number indicated above.

Respectfully submitted,


Jodie L. Ousley

Cc: Justin C. Frenkel, Esq.
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